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**UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA**

ANIBAL RODRIGUEZ, JULIEANNA
 MUNIZ, ELIZA CAMBAY, SAL
 CATALDO, EMIR GOENAGA, JULIAN
 SANTIAGO, HAROLD NYANJOM,
 KELLIE NYANJOM, and SUSAN LYNN
 HARVEY, individually and on behalf of all
 others similarly situated,

Plaintiffs,

vs.

GOOGLE LLC,

Defendant.

Case No.: 3:20-cv-04688

**DECLARATION OF ALEXANDER P.
 FRAWLEY IN SUPPORT OF
 ADMINISTRATIVE MOTION TO SEAL
 PORTIONS OF SECOND AMENDED
 COMPLAINT**

The Honorable Richard Seeborg
 Courtroom 3 – 17th Floor
 Trial Date: Not Yet Set

DECLARATION OF ALEXANDER P. FRAWLEY

I, Alexander P. Frawley, declare as follows.

1. I am an associate with the law firm of Susman Godfrey L.L.P, counsel for Plaintiffs in this matter. I am an attorney at law duly licensed to practice before all courts of the State of New York, and admitted *pro hac vice* in this case. (Dkt No. 81). I have personal knowledge of the matters set forth herein and am competent to testify.

2. Pursuant to Civil Local Rule 79-5(e), I submit this Declaration in Support of Plaintiffs' administrative motion to seal portions of the Second Amended Complaint. The Second Amended Complaint references material that Google LLC ("Google") has designated as "Confidential" and "Highly Confidential – Attorneys' Eyes Only" under the parties' Protective Order (Dkt No. 70).

3. Plaintiffs respectfully request that the Court seal the redacted portions of the Second Amended Complaint, attached hereto as Exhibit A.

4. Pursuant to Civil Local Rule 79-5(e)(1), Google, as the designating party, must file a declaration within 4 days establishing that all of the designated material is sealable.

5. I personally served a copy of this Declaration on Google's counsel of record by email on June 11, 2021. A Proof of Service is attached hereto as Exhibit B.

6. For the Court's convenience, a redline comparing the First Amended Complaint to the Second Amended Complaint is attached hereto as Exhibit C.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed this 11th day of June, 2021, at New York, New York.

/s/ Alexander P. Frawley